

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY :
MOE, individually and on behalf of all others similarly :
situated, :
: *Plaintiffs*, :
: No. 1:18-cv-09936 (LGS)
v. :
: THE TRUMP CORPORATION, DONALD J. TRUMP, in :
his personal capacity, DONALD TRUMP, JR., ERIC :
TRUMP, and IVANKA TRUMP, :
: *Defendants*. :
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DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFFS

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure and the applicable Local Rules for the Southern District of York, Defendants The Trump Corporation, Donald J. Trump, Donald Trump, Jr., Eric Trump, and Ivanka Trump (“Defendants”), by and through the undersigned counsel, hereby serve the following first set of interrogatories (“Interrogatories”) upon Plaintiffs Doe, Loe, Roe, and Moe (“Plaintiffs”) to be answered fully and completely, under oath on or before Wednesday, September 11, 2019.

DEFINITIONS OF TERMS

Unless otherwise specified, the following definition is applicable to these discovery requests:

1. “ACN” refers to American Communications Network (referenced in Paragraph 16 of the Amended Complaint), ACN Opportunity, LLC (Referenced in Paragraph 7(A) of the Complaint) and their parents, affiliates or subsidiaries.

2. The terms "Plaintiff," "You," "Your," or "Yourself" shall mean Plaintiffs Jane Doe, Luke Loe, Richard Roe, and Mary Moe and any current or former representative, agent, employee, and/or attorney.

INTERROGATORIES

1. State Your name, date of birth, and Social Security Number.
2. To the extent You identified Yourself to ACN by providing a name, date of birth, or Social Security Number that is (or are) different than those provided in response to Interrogatory 1, provide that name, date of birth, or Social Security Number.

Dated: September 6, 2019

By: /s/ Joanna C. Hendon
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